

PART 70 OPERATING PERMIT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY and CITY OF INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

**Commercial Finishing Corporation
1125 Brookside, Suite B
Indianapolis, Indiana, 46202**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15, IC 13-17 and the Code of Indianapolis and Marion County, Chapter 511.

Operation Permit No.: T097-7798-00178	
Issued by:	Issuance Date: December 31, 2002
Janet G. McCabe, Assistant Commissioner Office of Air Quality	Expiration Date: December 31, 2007
John B. Chavez, Administrator Office of Environmental Services City of Indianapolis	

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary source which is a job shop for miscellaneous metal parts coating and plastic business machines coating.

Responsible Official: Timothy Hughes
Source Address: 1125 Brookside Avenue, Suite B, Indianapolis, Indiana 46202
Mailing Address: 1125 Brookside Avenue, Suite B, Indianapolis, Indiana 46202
Phone Number: (317) 546-1351
SIC Code: 3479
County Location: Marion County
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) Binks spray paint booth, identified as PB1, vents to stack S7, installed in February, 1992, equipped with one (1) air atomization, electrostatic air spray, or airless spray gun for miscellaneous metal parts coating and plastic business machines coating, at a maximum capacity of 115 units per hour and a maximum of 0.173 gallons per unit, with dry filters for overspray control, and uses one (1) Advance natural gas-fired curing oven.
- (b) One (1) Binks spray paint booth, identified as PB2, vents to stack S8, installed in February, 1992, equipped with one (1) air atomization, electrostatic air spray, or airless spray gun for miscellaneous metal parts coating and plastic business machines coating, at a maximum capacity of 115 units per hour and a maximum of 0.173 gallons per unit, with dry filters for overspray control, and uses one (1) Advance natural gas-fired curing oven.
- (c) One (1) Binks spray paint booth, identified as PB3, vents to stack S10, installed in February, 1992, equipped with one (1) air atomization, electrostatic air spray, or airless spray gun for miscellaneous metal parts coating and plastic business machines coating, at a maximum capacity of 115 units per hour and a maximum of 0.173 gallons per unit, with dry filters for overspray control, and uses one (1) Advance natural gas-fired curing oven.
- (d) One (1) Binks spray paint booth, identified as PB4, vents to stack S9, installed in December, 1993, equipped with one (1) air atomization, electrostatic air spray, or airless spray gun for miscellaneous metal parts coating and plastic business machines coating,

at a maximum capacity of 115 units per hour and a maximum of 0.173 gallons per unit, with dry filters for overspray control, and uses one (1) Advance natural gas-fired curing oven.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5]

This stationary source does not include any insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21).

A.4 Insignificant Activities [326 IAC 2-7-1(21)]

This stationary source also consists of the following insignificant activities as defined in 326 IAC 2-7-1(21), which are not specifically regulated.

- (1) Combustion source flame safety purging on startup on dry off and bake oven.
- (2) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (3) Blowdown for any of the following: sight glass; boiler; compressors/ pumps; and cooling tower.
- (4) On-site fire and emergency response training approved by the department.
- (5) Filter or coalescer media changeout of four (4) paint booths dry filter replacement.
- (6) One (1) Binks Sames 8,000 CFM soft touch powder recovery booth (fully enclosed), identified as PB11, installed in April 1998, equipped with two (2) electrostatic spraying guns for miscellaneous metal parts coating, at a maximum capacity of 3876.9 ft²/hr with collection hopper and 100% capture and control efficiency.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22); and
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

- (a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the Indianapolis Office of Environmental Services (OES), the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) The Indianapolis Air Pollution Control Board (IAPCB) has adopted by reference state rules listed in Attachment A of this permit. The version adopted by reference includes all amendments, additions and repeals filed with the Secretary of State through August 10, 1997 and published in the Indiana Register September 1, 1997, unless otherwise indicated in the adoption by reference. For the purposes of this permit, all state rules adopted by reference by the IAPCB are enforceable by OES using local enforcement procedures. Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by OES.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ and OES, within a reasonable time, any information that IDEM, OAQ and OES may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ and OES copies of records required to be kept by this permit.
- (c) For information furnished by the Permittee to IDEM, OAQ or OES, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, and OES may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond its control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ and OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified OES within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

OES

Telephone No.: 317-327-2234 (ask for Data Compliance)

Facsimile No.: 317-327-2274

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, and OES may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify OES by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, or OES shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, and OES has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, and OES has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, and OES determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, and OES to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, and OES at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, and OES may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and OES and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
 - (2) If IDEM, OAQ, and OES, upon receiving a timely and complete permit application, fail to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, and OES, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, and OES, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, and OES fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
and

Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221
and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, and OES in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.
- The notification which shall be submitted is not considered an application form, report or compliance determination. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, OES and U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request.
[326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, and OES, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ or OES the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averaged for a continuous opacity monitor) in a six (6) hour period.

C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Enforcement Section, Asbestos Program
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 601, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.7 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ and OES of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and OES, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the

Permittee may extend the compliance schedule related to the equipment an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.11 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature or flow, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, and OES, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, and OES, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ and OES upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ and OES, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or Administrator of OES makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or OES within a reasonable time.
- (a) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

unless specifically stated otherwise in the D section.

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

One (1) Binks spray paint booth, identified as PB1, vents to stack S7, installed in February, 1992, equipped with one (1) air atomization, electrostatic air spray, or airless spray gun for miscellaneous metal parts coating and plastic business machines coating, at a maximum capacity of 115 units per hour and a maximum of 0.173 gallons per unit, with dry filters for overspray control, and uses one (1) Advance natural gas-fired curing oven.

One (1) Binks spray paint booth, identified as PB2, vents to stack S8, installed in February, 1992, equipped with one (1) air atomization, electrostatic air spray, or airless spray gun for miscellaneous metal parts coating and plastic business machines coating, at a maximum capacity of 115 units per hour and a maximum of 0.173 gallons per unit, with dry filters for overspray control, and uses one (1) Advance natural gas-fired curing oven.

One (1) Binks spray paint booth, identified as PB3, vents to stack S10, installed in February, 1992, equipped with one (1) air atomization, electrostatic air spray, or airless spray gun for miscellaneous metal parts coating and plastic business machines coating, at a maximum capacity of 115 units per hour and a maximum of 0.173 gallons per unit, with dry filters for overspray control, and uses one (1) Advance natural gas-fired curing oven.

One (1) Binks spray paint booth, identified as PB4, vents to stack S9, installed in December, 1993, equipped with one (1) air atomization, electrostatic air spray, or airless spray gun for miscellaneous metal parts coating and plastic business machines coating, at a maximum capacity of 115 units per hour and a maximum of 0.173 gallons per unit, with dry filters for overspray control, and uses one (1) Advance natural gas-fired curing oven.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to each spray booth in which plastic parts for use in the manufacture of business machines receive prime coats, color coats, texture coats, or touch up coats except when otherwise specified in 40 CFR 60, Subpart TTT.

D.1.2 New Source Performance Standards (NSPS) [326 IAC 12] [40 CFR 60.720]

Pursuant to 326 IAC 12 and 40 CFR 60.720, Subpart TTT- (Standards of Performance for Industrial Surface Coating of Plastic Parts for Business Machines), the provisions of this subpart apply to each spray booth in which plastic parts for use in the manufacture of business machines receive prime coats, color coats, texture coats, or touch up coats. Business machines include, but are not limited to, computers. The owner or operator shall:

- (a) Comply with the VOC content limitations including, but not limited to (1) through (4) below. Should the coating of plastic parts have not occurred within this time period, the Permittee shall comply with the content limitations upon the restart of such operations. No affected facility shall cause the discharge into the atmosphere in excess of:
 - (1) 1.5 kilograms of VOC's per liter of coating solids applied from prime coating of plastic parts for business machines.
 - (2) 1.5 kilograms of VOC's per liter of coating solids applied from color coating of plastic parts for business machines.

- (3) 2.3 kilograms of VOC's per liter of coating solids applied from texture coating of plastic parts for business machines.
- (4) 2.3 kilograms of VOC's per liter of coating solids applied from touch-up coating of plastic parts for business machines.

All VOC emissions that are caused by coatings applied in each affected facility, regardless of the actual point of discharge of emissions, shall be included in determining compliance with these emission limits.

D.1.3 HAP Emissions Limitation [326 IAC 2-7-5]

The Permittee shall limit the emissions of Hazardous Air Pollutants (HAPs) as follows:

- (1) The input of any combination of HAPs shall be limited to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month. During the first 12 month period after this permit is issued, the input of HAPs shall be limited such that the total usage of HAPs divided by the accumulated months shall not exceed 25 tons.
- (2) The input of any individual HAP shall be limited to less than 10 tons per twelve consecutive month period with compliance determined at the end of each month. During the first 12 month period after this permit is issued, the input of any individual HAP shall be limited such that the total usage of any individual HAPs divided by the accumulated months shall not exceed 10 tons.

Compliance with this Condition shall make National Emission Standards for Hazardous Air Pollutants and Section 112(j) of the Clean Air Act not applicable.

D.1.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

This source shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations): The four (4) paint booths shall be limited to one (1) or more of the following for miscellaneous metal parts:

- (a) 4.3 pounds of VOCs per gallon of coating excluding water delivered to a coating applicator for clear coating application systems;
- (b) 3.5 pounds of VOCs per gallon of coating excluding water delivered to a coating applicator in the coating application systems that are air dried or forced warm air dried at temperatures up to one hundred ninety-four degrees Fahrenheit (194°F);
- (c) 3.5 pounds of VOCs per gallon of coating excluding water delivered to a coating applicator for extreme performance coating application systems; and
- (d) 3.0 pounds of VOCs per gallon of coating excluding water delivered to a coating applicator for all other coating application systems.

- (e) When non-compliant coatings are used for any particular day for a paint booth, the daily volume weighted averaging of the coatings shall be used to determine compliance with the limitation set in this condition for that paint booth pursuant to 326 IAC 8-1-2(a)(7). This volume weighted average shall be determined by the following equation:

$$A' E(CxU)/EU$$

Where: A is the volume weighted average in pounds VOC per gallon
C is the VOC content of the coating in pounds VOC per gallon, and
U is the usage rate of the coating in gallons per unit, hour, day, or other unit of time;

D.1.6 VOC Emissions Limit [326 IAC 8-1-6]

Pursuant to CP 915037-02, issued September 17, 1991, each paint booth, when coating items not regulated pursuant to 326 IAC 8-2-9, is limited to less than 25 tons of VOC per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.

D.1.7 Particulate Matter (PM) [326 IAC 6-1-2(a)]

The PM emissions from each of the four (4) paint booths (PB1, PB2, PB3, and PB4) shall not exceed 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (g/dscf)).

D.1.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.9 Testing Requirements [326 IAC 2-7-6(1)] [40 CFR 60.8(a)] [40 CFR 60.723]

When coating plastic parts subject to 40 CFR 60, Subpart TTT (Surface Coating of Plastic Parts for Business Machines), the Permittee shall conduct an initial performance test as required under 40 CFR 60.8(a), and thereafter a performance test each nominal one (1)-month period for each affected facility according to the following procedures:

- (1) Determine the composition of coatings by analysis of each coating, as received, using:
 - (A) Reference Method 24,
 - (B) From data that have been determined by the coating manufacturer using Reference Method 24, or
 - (C) By other methods approved by the U.S. EPA.
- (2) Determine the volume of coating and the mass of VOC used for dilution of coatings from company records during each nominal one (1)-month period. Should the owner or operator use a common coating distribution system which serves affected and nonaffected spray booths, the owner or operator shall estimate the volume of coatings used at each facility by using procedures approved by IDEM, OAQ and OES. Nominal one (1)-month period means either:

- (A) Calendar month,
 - (B) A 30-day month,
 - (C) An accounting month, or
 - (D) Similar monthly time period that is established in a statement submitted to OES and IDEM, OAQ within 60 days of the receipt of this permit.
- (3) Calculate the mass of VOCs used ($M_o + M_d$) for each coating operation during a one (1)-month period for each affected facility by the following equation:

$$M_o + M_d = \sum_{i=1}^n L_{ci} D_{ci} W_{oi} + \sum_{j=1}^m L_{dj} D_{dj}$$

where n is the number of coatings of each type used during each nominal one (1)-month period and m is the number of different diluent VOCs used during each nominal one (1)-month period.

- (4) Calculate the total volume of coating solids consumed (L_s) in a nominal one (1)-month period for each coating operation for each affected facility by the following equation:

$$L_s = \sum_{i=1}^n L_{ci} V_{si}$$

where n is the number of coatings of each type used during a one (1)-month period.

- (5) Select the appropriate transfer efficiency (T) from the table below for each type of coating applications equipment used at each coating operation:

Table 1.: Transfer Efficiencies		
Application Methods	Transfer Efficiency	Type of Coating
Air atomized spray	0.25	Prime, color, texture, touch up, and fog coats.
Air assisted airless spray	0.40	Prime and color coats
Electrostatic air spray	0.40	Prime and color coats

If the owner or operator can demonstrate to the satisfaction of the U.S. EPA that transfer efficiencies other than those shown above are appropriate, the U.S. EPA will approve their use on a case-by-case basis. Transfer efficiency values for application methods not listed shall be approved by the U.S. EPA on a case-by-case basis. An owner or operator must submit sufficient data for the U.S. EPA to judge the validity of the transfer efficiency claims.

- (6) Where more than one application method is used within a single coating operation, the owner or operator shall determine the volume of each coating applied by each method through a means acceptable to IDEM, OAQ and OES and compute the volume-weighted average transfer efficiency by the following equation:

$$T_{avg} = \frac{\sum_{i=1}^n \sum_{k=1}^p L_{cik} V_{sik} T_k}{L_s}$$

where n is the number of coatings of each type used and p is the number of application methods used.

- (7) Calculate the volume-weighted average mass of VOCs emitted per unit volume of coating solids applied (N) during each nominal one (1)-month period for each coating operation for each affected facility by the following equation:

$$N = \frac{M_o \% M_d}{L_s T_{avg}}$$

($T_{avg} = T$ when only one type of coating operation occurs.)

All symbols used in Condition D.1.3 not defined elsewhere in this condition are specified below.

where: D_c = density of each coating as received (kilograms per liter)
 D_d = density of each diluent VOC (kilograms per liter)
 L_c = the volume of each coating consumed, as received (liters)
 L_d = the volume of each diluent VOC added to coatings (liters)
 L_s = the volume of coating solids consumed (liters)
 M_d = the mass of diluent VOCs consumed (liters)
 M_o = the mass of VOCs in coatings consumed, as received (liters)
 N = the volume-weight average mass of VOC emissions to the atmosphere per unit volume of coating solids applied (kilograms per liter)
 n = number of coatings of each type used during each nominal one (1)-month period
 m = number of different diluent VOCs used during each nominal one (1)-month period
 T = the transfer efficiency for each type application equipment used at a coating operation (fraction)
 T_{avg} = the volume-weighted average transfer efficiency for a coating operation (fraction)
 V_s = the proportion of solids in each coating, as received (fraction by volume)
 W_o = the proportion of VOCs in each coating, as received (fraction by weight)

D.1.10 Volatile Organic Compounds (VOC)

- (a) Compliance with the VOC content limitations contained in Conditions D.1.2 and D.1.5 shall be determined pursuant to 326 IAC 8-2-9(d)(2) and (3), 326 IAC 12 (Subpart TTT, CFR 60.722(a)(1) through (4)), 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" VOC data sheets. IDEM, OAQ, and OES reserve the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) Solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such manner that evaporation is minimized.

D.1.11 VOC Emissions

Compliance with Condition Nos. D.1.3, D.1.4 and D.1.6 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.12 Particulate Matter (PM)

The filter media for PM control shall be in operation at all times when the four (4) paint booths (PB1, PB2, PB3, and PB4) are in operation.

D.1.13 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.14 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2, D.1.4, D.1.5, D.1.6, D.1.10, and D.1.11, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition Nos. D.1.2, D.1.4, D.1.5, and D.1.6.

- (1) The VOC content of each coating material and solvent added to coatings used less water.
 - (2) The amount of coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month;
 - (5) The weight of VOCs emitted for each compliance period;
 - (6) For Condition D.1.5, when non-compliant coatings are used for any particular day for a paint booth, the volume weighted average VOC content of the coatings shall be used to determine compliance with the limitation for that day for that paint booth; and
 - (7) A log of the dates of use of non-compliant coatings.
- (b) To document compliance with Conditions D.1.7, D.1.12 and D.1.13, the Permittee shall maintain a log of daily filter observations, weekly and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) The Permittee shall maintain records in accordance with (1) through (3) below, to document compliance with Conditions D.1.3. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP emission limits established in Condition D.1.3.
- (1) The amount and HAP content of each solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The total HAP usage for each month; and
 - (3) The weight of HAPs emitted for each compliance period.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.15 Reporting Requirements

-
- (a) A quarterly summary of the information to document compliance with Conditions D.1.3, D.1.4, and D.1.6 shall be submitted to OES at the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The report of the initial performance test required to demonstrate initial compliance with Condition D.1.2 and 40 CFR 60, Subpart TTT, shall include the following data:
 - (a) Data required under 40 CFR 60.8(a);
 - (b) Except as provided for in (3) below, the volume weighted average mass of VOC's emitted to the atmosphere per volume of applied coatings solids (N) for the initial nominal 1-month period for each coating operation from each affected paint booth;
 - (c) For each paint booth where compliance is determined under the provisions of 40 CFR 60.723(b)(2)(iii), a list of the coatings used during the initial nominal 1-month period, the VOC content of each coating calculated from data determined using Reference Method 24, and the lowest transfer efficiency at which each coating is applied during the initial nominal 1-month period.
- (c) Following the submittal of the initial report, to demonstrate compliance with Condition D.1.2, a quarterly report of non-compliance shall be submitted to IDEM, OAQ and OES at the addresses listed in Section C - General Reporting Requirement, of this permit. The report must be postmarked within ten (10) days after the end of the quarter being reported. The report must include, pursuant to 40 CFR 60.724(b)(1), the volume weighted average mass of VOC's per unit volume of coating solids applied for each coating operation for each affected facility during each nominal 1-month period in which the facility is not in compliance with the applicable emission limits specified in 40 CFR 60.722. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Following the submittal of the initial report, to document compliance with Condition D.1.2, a semi-annual statement of compliance, pursuant to 40 CFR 60.724(b)(2), shall be submitted to IDEM, OAQ and OES at the addresses listed in Section C - General Reporting Requirement, of this permit. The report must be postmarked within ten (10) days after the end of the 6 month period being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Commercial Finishing Corporation
Source Address: 1125 Brookside Avenue, Suite B, Indianapolis, Indiana 46202
Mailing Address: 1125 Brookside Avenue, Suite B, Indianapolis, Indiana 46202
Part 70 Permit No.: T097-7798-00317

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION
2700 South Belmont Ave.
Indianapolis Indiana 46221
Phone: 317-327-2234
Fax: 317-327-2274**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Commercial Finishing Corporation
Source Address: 1125 Brookside Avenue, Suite B, Indianapolis, Indiana 46202
Mailing Address: 1125 Brookside Avenue, Suite B, Indianapolis, Indiana 46202
Part 70 Permit No.: T097-7798-00317

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
91	This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the OES and OAQ, within four (4) business hours; and C The Permittee must submit notice in writing or by facsimile within two (2) working days, and follow the other requirements of 326 IAC 2-7-16
92.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE**

**Part 70 Quarterly Report
Limit of 249 Tons VOC Per Twelve (12) Month Period**

Source Name: Commercial Finishing Corporation
Source Address: 1125 Brookside Avenue, Suite B, Indianapolis, Indiana 46202
Mailing Address: 1125 Brookside Avenue, Suite B, Indianapolis, Indiana 46202
Part 70 Permit No.: T097-7798-00317
Limit: VOC Emissions no greater than **249 tons** per twelve month period rolled on a monthly basis

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE**

**Part 70 Quarterly Report
HAP Emission Limits**

Source Name: Commercial Finishing Corporation
Source Address: 1125 Brookside Avenue, Suite B, Indianapolis, Indiana 46202
Mailing Address: 1125 Brookside Avenue, Suite B, Indianapolis, Indiana 46202
Part 70 Permit No.: T097-7798-00317
Limit: HAP Emissions less than **10 tons** per any single HAP and less than **25 tons** combination of HAPs

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE**

**Part 70 Quarterly Report
Limit of 24 Tons VOC Per Twelve (12) Month Period Per Paint Booth
When not Coating Parts Subject to 326 IAC 8-2-9**

Source Name: Commercial Finishing Corporation
Source Address: 1125 Brookside Avenue, Suite B, Indianapolis, Indiana 46202
Mailing Address: 1125 Brookside Avenue, Suite B, Indianapolis, Indiana 46202
Part 70 Permit No.: T097-7798-00317
Limit: VOC Emissions no greater than **24 tons** per twelve month period rolled on a monthly basis (Copy as Needed for Each Paint Booth) when not coating parts subject to 326 IAC 8-2-9

PAINT BOOTH ID: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Commercial Finishing Corporation
Source Address: 1125 Brookside Avenue, Suite B, Indianapolis, Indiana 46202
Mailing Address: 1125 Brookside Avenue, Suite B, Indianapolis, Indiana 46202
Part 70 Permit No.: T097-7798-00317

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly. Any deviation from the requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify zero in the column marked "No Deviations".

LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

Requirement (e.g. Permit Condition D.1.1)	Number of Deviations	Date of each Deviations	No Deviations

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Attachment A

The following state rule have been adopted by reference by the Indianapolis Air Pollutant Control Board and are enforceable by Indianapolis Office of Environmental Services (OES) using local enforcement procedures.

- (1) 326 IAC 1-1-1 through 1-1-3 and 1-1-5;
- (2) 326 IAC 1-2-1 through 1-2-91 (In addition, the IAPCB has adopted several local definitions);
- (3) 326 IAC 1-3-1 through 1-3-4;
- (4) 326 IAC 1-4-1 (The IAPCB added to the adoption by reference a citation to 61 FR 58482 (November 15, 1996));
- (5) 326 IAC 1-5-1 through 1-5-5;
- (6) 326 IAC 1-6-1 through 1-6-6;
- (7) 326 IAC 1-7-1 through 1-7-5
- (8) 326 IAC 2-3-1 through 2-3-5;
- (9) 326 IAC 2-4-1 through 2-4-6;
- (10) 326 IAC 2-6-1 through 2-6-4;
- (11) 326 IAC 2-7-1 through 2-7-18, 2-7-20 through 2-7-25;
- (12) 326 IAC 2-8-1 through 2-8-15, 2-8-17 through 2-8-10;
- (13) 326 IAC 2-9-1 through 2-9-14;
- (14) 326 IAC 2-10-1 through 2-10-5 (The IAPCB adoption adds the language "state or local" immediately after the word "federal" in 326 IAC 2-10-1);
- (15) 326 IAC 2-11-1, 2-11-3 and 2-11-4 (The IAPCB adoption adds the language "federal, state or local" immediately after the word "by" in 326 IAC 2-11-1);
- (16) 326 IAC 3-1.1-1 through 3-1.1-5;
- (17) 326 IAC 3-2.1-1 through 3-2.1-5;
- (18) 326 IAC 3-3-1 through 3-3-5;
- (19) 326 IAC 4-2-1 through 4-2-2;
- (20) 326 IAC 5-1-1 (a), (b) and c) (5), 5-1-2 (1), (2)(A), (2)c) (4), 5-1-3 through 5-1-5, 5-1-7;
- (21) 326 IAC 7-1.1-1 and 7-1.1-2;
- (22) 326 IAC 7-2-1;
- (23) 326 IAC 7-3-1 and 7-3-2;
- (24) 326 IAC 7-4-2(28) through (31) (Instead of adopting by reference 7-4-2(1) through (27), the IAPCB regulation substitutes the same requirements listed in a format in which the companies are alphabetized and emission points known to no longer exist have been deleted);
- (25) 326 IAC 8-1-0.5 except (b), 8-1-1 through 8-1-2, 8-1-3 except c), (g) and (i), 8-1-5 through 8-1-12;
- (26) 326 IAC 8-2-1 through 8-2-12 (The IAPCB adoption by reference of 8-2- 5 adds additional language specific to Zimmer Paper Products, Incorporated as subpart c);
- (27) 326 IAC 8-3-1 through 8-3-7;
- (28) 326 IAC 8-4-1 through 8-4-5, 8-4-6 (a)(6), (a)(8) and (a)(14) and 8-4-6(b)(1), (b)(3) and 8-4-6c) (In place of 8-4-6(b)(2), which was not adopted, the IAPCB adopted language requiring a pressure relief valve set to release at no less than four and eight-tenths (4.8) Kilo Pascals (seven-tenths (0.7) pounds per square inch)), 8-4-7 except (e), 8-4-8 and 8-4-9;
- (29) 326 IAC 8-5-1 through 8-5-4, 8-5-5 except (a)(3) and (d)(3);
- (30) 326 IAC 8-6-1 and 8-6-2;
- (31) 326 IAC 9-1-1 and 9-1-2;
- (32) 326 IAC 11-1-1 through 11-1-2;
- (33) 326 IAC 11-2-1 through 11-2-3;
- (34) 326 IAC 11-3-1 through 11-3-6;
- (35) 326 IAC 14-1-1 through 14-1-4;

Attachment A continued

- (36) 326 IAC 14-2-1 except 40 CFR 61.145;
- (37) 326 IAC 14-3-1;
- (38) 326 IAC 14-4-1;
- (39) 326 IAC 14-5-1;
- (40) 326 IAC 14-6-1;
- (41) 326 IAC 14-7-1;
- (42) 326 IAC 14-8-1 through 14-8-5;
- (43) 326 IAC 15-1-1, 15-1-2(a)(1), (a)(2) and (a)(8), 15-1-3 and 15-1-4;
- (44) 326 IAC 20-1-1 through 20-1-4 (In 20-1-3(b)(2) the adoption states that "permitting authority" means the commissioner of IDEM or the administrator of OES, whichever is applicable);
- (45) 326 IAC 20-2-1;
- (46) 326 IAC 20-3-1;
- (47) 326 IAC 20-4-1;
- (48) 326 IAC 20-5-1;
- (49) 326 IAC 20-6-1;
- (50) 326 IAC 20-7-1;
- (51) 326 IAC 20-8-1;
- (52) 326 IAC 20-9-1;
- (53) 326 IAC 20-14-1;
- (54) 326 IAC 20-15-1;
- (55) 326 IAC 20-16-1;
- (56) 326 IAC 20-17-1;
- (57) 326 IAC 20-18-1;
- (58) 326 IAC 20-19-1;
- (59) 326 IAC 20-20-1;
- (60) 326 IAC 20-21-1;
- (61) 326 IAC 21-1-1 (The adoption states that "or the administrator of OES" is added in (b));
- (62) 326 IAC 22-1-1 (The adoption states that "or the administrator of OES" is added in (b)).

**Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Office of Environmental Services**

**Addendum to the
Technical Support Document for a Part 70 Operating Permit**

Source Name: Commercial Finishing Corporation
Source Location: 1125 Brookside Avenue, Indianapolis, IN
County: Marion
SIC Code: 3479
Operation Permit No.: T097-7798-00178
Permit Reviewer: Amanda Hennessy

On September 6, 2002, the Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Commercial Finishing had applied for a Part 70 Operating Permit to operate a surface coating operation. The notice also stated that OAQ and OES proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The following changes to the draft Title V Permit will be made. The TSD will remain as it originally appeared when published. OAQ and OES prefer that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the permit has been published are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Bolded language has been added; the language with a line through it has been deleted; and the Table of Contents has been updated where necessary.

IDEM and OES have made the following changes:

- (1) Condition D.1.15(c) (now Condition D.1.14(b) - See change (2) and Comment 5), will be changed as follows:
 - (eb) To document compliance with Conditions ~~D.1.2, D.1.3, D.1.5, D.1.6~~ **D.1.7**, D.1.14 ~~12~~ and D.1.14 ~~13~~, the Permittee shall maintain a log of daily filter observations, weekly and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (2) The requirement to monitor oven temperature has been removed because oven temperature is only needed to determine applicability of which limit in 326 IAC 8-2-9 is appropriate. Oven temperature is not enforceable. Therefore, Condition D.1.12 and all references to D.1.12 are being removed and all conditions after D.1.12 are being renumbered.

D.1.12 Oven Temperature Monitoring [326 IAC 8-2-9]

~~To determine compliance with Condition D.1.4, a temperature gauge shall be installed and maintained which has the capability of recording the temperature of the oven whenever a paint booth is in operation, provided the capability exists to move items from that paint booth into a particular oven. In cases where items painted in a booth cannot be transferred to a particular oven, the monitoring of the oven temperature is not required. The temperature monitoring system shall be calibrated, maintained and operated in accordance with the manufacturer's recommendations for similar applications and as provided in this permit. The temperature shall be recorded on a strip chart and available for inspection as provided in this permit.~~

- (3) Condition B.3 (b) will be changed as follows:

B.3 Enforceability [326 IAC 2-7-7]

- (a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the Indianapolis Office of Environmental Services (OES), the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) **The Indianapolis Air Pollution Control Board (IAPCB) has adopted by reference state rules listed in Attachment A of this permit. The version adopted by reference includes all amendments, additions and repeals filed with the Secretary of State through August 10, 1997 and published in the Indiana Register September 1, 1997, unless otherwise indicated in the adoption by reference. For the purposes of this permit, all state rules adopted by reference by the IAPCB are enforceable by OES using local enforcement procedures.** Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by OES.
- (4) The unrestricted Potential to Emit (PTE) table in the TSD had incorrectly reflected the PTE of VOC and HAPs. Calculations in Attachment A show the PTE of VOC to be 292.31. The table should read as follows:

Pollutant	Potential Emissions (tons/year)
PM	198.58
PM-10	198.58
SO ₂	0
VOC	4,169 292.31
CO	0
NO _x	0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Toluene	43.48 10.87
Xylene	86.93 21.73
Ethyl benzene	43.28 3.36
TOTAL	130.4 32.6

- (5) In order to avoid confusion for renewals as to what "original" date we are referring to the following change has been made:

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the ~~original~~ **issuance** date of this **permit**, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

- (6) Since B.7 (c) Duty to Supplement and Provide Information already addresses confidentiality, the last sentence of (b) was revised to remove the statement about confidential information, and (c) was updated for clarity.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ and OES, within a reasonable time, any information that IDEM, OAQ and OES may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ and OES copies of records required to be kept by this permit. ~~or, for information claimed to be confidential, the Permittee may furnish such records directly to U. S. EPA, along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]~~
- (c) **For information furnished by the Permittee to IDEM, OAQ or OES**, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

- (7) B.11 Preventive Maintenance Plan has been revised because it is not necessary to state twice that the PMP does not need to be certified. Since it is more appropriate to state in (c), it has been removed from (a).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond its control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The ~~PMP and the~~ PMP extension notification **does** not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (8) The requirement to include emergencies in the Quarterly Deviation and Compliance Monitoring Report has been moved from B.15 to B.12. B.12(e) Emergency Provisions has been revised to correct the rule cite as follows:

B.12 Emergency Provisions [326 IAC 2-7-16]

- (e) IDEM, OAQ, and OES may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(~~109~~) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, and OES by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

- (9) B.13 (h) Permit Shield has been revised to correct the rule cite as follows:

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, and OES has issued the modification. [326 IAC 2-7-12(b)(~~78~~)]

- (10) (c) has been removed from B.15 Deviations from Permit Requirements and Conditions, then revised and incorporated in B.12 Emergency Provisions.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- ~~(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.~~

- (11) In order to be consistent with 326 IAC 2-7-20(a)(4) the rule cite in B.20(a)(5) has been revised as follows:

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, and OES in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (12) B.21 was revised as follows:

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the ~~applicable provisions~~ **requirements of 326 IAC 2 and 326 IAC 2-7-10.5.**

- (13) 326 IAC 2-1.1-7 specifies that nonpayment may result in revocation of the permit. This is not specified in 326 IAC 2-7; therefore, this rule cite is being added to B.24. Also, the section and phone number of who the Permittee can contact has been corrected in (c).

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-~~0425 4230~~ (ask for OAQ, ~~Technical Support and Modeling Section I/M & Billing Section~~), to determine the appropriate permit fee.

- (14) C.6(d) Asbestos Abatement Projects listed the statement about certification twice; one has been deleted, and (e) has been revised to correct the rule cite.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (d)The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34). ~~The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-~~41~~ emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (15) The following was added to C.8 Compliance Requirements to state what OAQ does when stack testing, monitoring, or reporting is required to assure compliance with applicable requirements:

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements **by issuing an order under 326 IAC 2-1.1-11.** Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

- (16) The new VOC language has been incorporated into D.1.10.

D.1.10 Volatile Organic Compounds (VOC)

- (1) Compliance with the VOC content limitations contained in Conditions D.1.2 and D.1.5 shall be determined pursuant to 326 IAC 8-2-9(d)(2) and (3), 326 IAC 12 (Subpart TTT, CFR 60.722(a)(1) through (4)), ~~and 326 IAC 8-1-64(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer and recording oven temperatures~~ **by preparing or obtaining from the manufacturer the copies of the "as supplied" VOC data sheets.** IDEM, OAQ, and OES reserve the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (17) The first sentence of the Quarterly Deviation and Compliance Monitoring Report is being removed, because it poses a conflict with the provisions that require an annual certification. We were not intending to turn this quarterly report into a compliance certification.

Quarterly Deviation and CM Report

~~This report is an affirmation that the source has met all the requirements stated in this permit.~~ This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

- (18) The first box on the Emergency Occurrence Report Form was revised to include the word "working" in order to be consistent with 326 IAC 2-7-16(b)(5) and the Emergency Provision.

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
91	This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the OES and OAQ, within four (4) business hours; and C The Permittee must submit notice in writing or by facsimile within two (2) working days, and follow the other requirements of 326 IAC 2-7-16
92.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (10) calendar days

On October 4, 2002, Mary Ann Saggese of Plews, Shadley Racher & Braun Attorneys at Law submitted comments on the proposed Part 70 permit on behalf of Commercial Finishing Corporation. The summary of the comments and responses to comments follows with ~~strikeout~~ showing deleted text and **bold** showing new text.

Comment 1: Conditions B.7, B.10, B.12(b)(4) and (5), B.12(f), B.15(a), B.17(a) and (b)(1)(B), B.18(b), B.20(a)(4) and (5), B.23(b), B.24(a), C.6(d), C.7(a) and (b), C.9, C.12(b), C.14(a), C.15(a), C.16(b) and (c), C.18(b) and (c), D.16 This draft Part 70 Operating Permit proposes to require Commercial Finishing to submit information in duplicate to both the IDEM, OAQ and OES pursuant to 30 events triggered by this permit (including emergency notification within 4 hours and payment of fees to both agencies). 30 TIMES. The Part 70 Operating Permit Program is supposed to consolidate and streamline the operating permits of the past. While Commercial Finishing recognizes the regulatory

authority of IDEM and the OES, IDEM has delegated its responsibilities to facilitate the air permitting requirements to the OES. Surely IDEM did not intend to increase the regulatory burdens for sources located in Marion County just by delegating its responsibilities to OES. The OES should, therefore, be the initial contact for the events of information and report submittals and notifications. It does not aid the administration of a Part 70 Operating Permit for both IDEM and OES to have a copy of the same documents for which a response or action would be delegated to OES, IDEM's authorized agent or delegate. The duplication of these 30 document triggering events is over burdensome, redundant, unnecessary and would only add to the reporting burden already associated with the Part 70 Operating Permit. Commercial Finishing requests that the language in these 30 sections be revised to require notification or submittal of the specified documents to only one authority, "to the OES, acting on behalf of IDEM, OAQ."

Response: Both IDEM, OAQ and OES have regulatory authority over sources located in Marion County. However, IDEM, OAQ and OES have determined that the quarterly reports and emergency notifications do not have to be submitted to IDEM. The addresses on the reporting forms have been adjusted and the permit was changed as follows:

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified ~~IDEM, OAQ, and~~ OES within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

~~Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or~~

~~Telephone Number: 317-233-5674 (ask for Compliance Section)-~~

~~Facsimile Number: 317-233-5967~~

OES

Telephone No.: 317-327-2234 (ask for Data Compliance)

Facsimile No.: 317-327-2274

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~and~~

Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, and OES may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, and OES by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

unless specifically stated otherwise in the D section.

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

D.1.15 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Conditions D.1.3, D.1.4, and D.1.6 shall be submitted to **OES at** the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report of the initial performance test required to demonstrate initial compliance with Condition D.1.2 and 40 CFR 60, Subpart TTT, shall include the following data:
- (a) Data required under 40 CFR 60.8(a);

- (b) Except as provided for in (3) below, the volume weighted average mass of VOC's emitted to the atmosphere per volume of applied coatings solids (N) for the initial nominal 1-month period for each coating operation from each affected paint booth;
- (c) For each paint booth where compliance is determined under the provisions of 40 CFR 60.723(b)(2)(iii), a list of the coatings used during the initial nominal 1-month period, the VOC content of each coating calculated from data determined using Reference Method 24, and the lowest transfer efficiency at which each coating is applied during the initial nominal 1-month period.
- (c) Following the submittal of the initial report, to demonstrate compliance with Condition D.1.2, a quarterly report of non-compliance shall be submitted to **IDEM, OAQ and OES** at the addresses listed in Section C - General Reporting Requirement, of this permit. The report must be postmarked within ten (10) days after the end of the quarter being reported. The report must include, pursuant to 40 CFR 60.724(b)(1), the volume weighted average mass of VOC's per unit volume of coating solids applied for each coating operation for each affected facility during each nominal 1-month period in which the facility is not in compliance with the applicable emission limits specified in 40 CFR 60.722. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Following the submittal of the initial report, to document compliance with Condition D.1.2, a semi-annual statement of compliance, pursuant to 40 CFR 60.724(b)(2), shall be submitted to **IDEM, OAQ and OES** at the addresses listed in Section C - General Reporting Requirement, of this permit. The report must be postmarked within ten (10) days after the end of the 6 month period being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Comment 2: Condition D.1 Facility Description The installation date for the Binks spray paint booth, identified as PB4, is incorrectly referenced in this section and should be corrected to December 1993.

Response: The description has been changed as follows:

One (1) Binks spray paint booth, identified as PB4, vents to stack S9, installed in December, ~~4994~~ **1993**, equipped with one (1) air atomization, electrostatic air spray, or airless spray gun for miscellaneous metal parts coating and plastic business machines coating, at a maximum capacity of 115 units per hour and a maximum of 0.173 gallons per unit, with dry filters for overspray control, and uses one (1) Advance natural gas-fired curing oven.

Comment 3: Condition D.1.11 VOC Emissions

Commercial Finishing requests that this compliance demonstration be revised to allow demonstration "30 days after the end of each month" to allow time to collect the information and calculate emissions.

Response: OES agrees that for VOC sources this is the standard. D.1.11 has been changed as follows:

D.1.11 VOC Emissions

Compliance with Condition Nos. D.1.3, D.1.4 and D.1.6 shall be demonstrated ~~at the~~ **within 30 days of the** end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Comment 4: Condition D.1.12 Oven Temperature Monitoring Commercial Finishing provides no additional comment regarding the inapplicability of Condition D.1.12 (Oven Temperature Monitoring) as it appears in the public noticed draft permit because Amanda Hennessy of OES has stated that the entire condition has been deleted.

Response: Condition D.1.12 has been deleted (see Change #2 on page 1) because oven temperature is only needed to determine applicability, not to determine compliance.

~~D.1.12 Oven Temperature Monitoring [326 IAC 8-2-9]~~

~~To determine compliance with Condition D.1.4, a temperature gauge shall be installed and maintained which has the capability of recording the temperature of the oven whenever a paint booth is in operation, provided the capability exists to move items from that paint booth into a particular oven. In cases where items painted in a booth cannot be transferred to a particular oven, the monitoring of the oven temperature is not required. The temperature monitoring system shall be calibrated, maintained and operated in accordance with the manufacturer's recommendations for similar applications and as provided in this permit. The temperature shall be recorded on a strip chart and available for inspection as provided in this permit.~~

Comment 5: Condition D.1.15 Record Keeping Requirements Commercial Finishing agrees with the substance of the latest revisions to Condition D.1.15(b) (now D.1.14(b)) which are attached to these comments. However, it is unnecessary and repetitive to separate provisions (a) and (b) when the same record keeping for Conditions D.1.2, D.1.4, D.1.5, D.1.6, D.1.10 and D.1.11 are correctly to be taken on a monthly basis except for when non-compliant coatings are used for any particular day for a paint booth. We also note that the public noticed version of D.1.15(a)(2) incorrectly would require a log which identifies the coating and the "date" the coating was used when the date is not applicable and "month" would be correct. We request that (a) and (b) be rejoined as one provision with the exception for non-compliant coatings separated.

Response: OES and IDEM agree that provision (a) and (b) can be combined. Conditions (c), (d) and (e) will change to (b), (c) and (d). Conditions (a) and (b) will be changed as follows:

~~D.1.14~~ **Record Keeping Requirements**

~~(a) To document compliance with Conditions D.1.2, D.1.4, D.1.6, and D.1.11, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition Nos. D.1.2, D.1.4, and D.1.6.~~

~~(1) The amount and VOC content of each coating material and solvent added to coatings used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

~~(2) A log which identifies the coating and the date the coating was used;~~

~~(3) The cleanup solvent usage for each month;~~

~~(4) The total VOC usage for each month; and~~

~~(5) The weight of VOCs emitted for each compliance period.~~

~~(b) To document compliance with Conditions D.1.5, D.1.11 and D.1.12 the Permittee shall~~

~~maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC limits established in Condition Nos. D.1.5 and D.1.11.~~

- ~~_____ (1) The VOC content of each coating material and solvent added to coatings used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
- ~~_____ (2) A log which identifies the coating, the date the coating was used, and the maximum drier/oven temperature;~~
- ~~_____ (3) For Condition D.1.5, when non-compliant coatings are used for any particular day for a paint booth, the volume weighted averaging of the coatings shall be used to determine compliance with the limitation for that paint booth;~~

(a) To document compliance with Conditions D.1.2, D.1.4, D.1.5, D.1.6, D.1.10, and D.1.11, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition Nos. D.1.2, D.1.4, D.1.5, and D.1.6.

- (1) The VOC content of each coating material and solvent added to coatings used less water.**
- (2) The amount of coating material and solvent used on monthly basis.**
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.**
- (3) The cleanup solvent usage for each month;**
- (4) The total VOC usage for each month;**
- (5) The weight of VOCs emitted for each compliance period;**
- (6) For Condition D.1.5, when non-compliant coatings are used for any particular day for a paint booth, the volume weighted average VOC content of the coatings shall be used to determine compliance with the limitation for that day for that paint booth; and**
- (7) A log of the dates of use of non-compliant coatings.**

(eb) To document compliance with Conditions D.1.7, D.1.12 and D.1.13, the Permittee shall maintain a log of daily filter observations, weekly and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(ec) The Permittee shall maintain records in accordance with (1) through (3) below, to

document compliance with Conditions D.1.3. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP emission limits established in Condition D.1.3.

- (1) The amount and HAP content of each solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The total HAP usage for each month; and
 - (3) The weight of HAPs emitted for each compliance period.
- (ed) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 6: Condition D.1.16(c) and (d) Reporting Requirements Commercial Finishing presently does not coat any plastic parts for business machines. (We do coat bar coders but these would not, we understand, be determined by OES to be business machines). The proposed permit would inappropriately require Commercial Finishing to perform certain requirements based upon issuance of this permit rather than when or if the Subpart TTT New Source Performance Standards ever become applicable to this source. Because the Subpart TTT is not currently applicable to this source, it is overburdensome, wholly unnecessary, and not supported by the regulations to require Commercial Finishing to submit inapplicable reports. We request that the following sentence preface provisions (c) and (d):

"If the Permittee initiates the coating of plastic parts for business machines pursuant to the NSPS, Subpart TTT, Permittee shall submit..."

Response: In regards to the coating of bar coders, OES contacted Commercial Finishing and they are not, at this time, coating bar coders. Commercial Finishing has, in the past, coated bar coders. Commercial Finishing provided the SIC code of the company that manufactured the bar coders. This SIC code was not listed in Subpart TTT as an applicable SIC code.

The New Source Performance Standard, Subpart TTT states that the reports of non-compliance and the statements of compliance shall be submitted "Following the initial report." Therefore, the words "following the submittal of the initial report" have been inserted prior to the conditions. However, once the initial report has been submitted, the Permittee shall submit the report of non-compliance for any nominal 1-month period in which the facility is not in compliance with the applicable emission limits in 40 CFR 60.722. In addition, once the initial report has been submitted, the Permittee shall submit statements of compliance on a semi-annual basis. If no plastic parts for business machines were coated in any given nominal one month period, the statement of compliance shall still be submitted. The permit has been changed as follows:

- (c) **Following the submittal of the initial report,** ~~To~~ demonstrate compliance with Condition D.1.2, a quarterly report of non-compliance shall be submitted to the addresses listed in Section C - General Reporting Requirement, of this permit. The report must be postmarked within ten (10) days after the end of the quarter being reported. The report must include, pursuant to 40 CFR 60.724(b)(1), the volume weighted average mass of VOC's per unit volume of coating solids applied for each coating operation for each affected facility during each nominal 1-month period in which the facility is not in compliance with the applicable emission limits specified in 40 CFR

60.722. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) **Following the submittal of the initial report,** ~~To~~ to document compliance with Condition D.1.2, a semi-annual statement of compliance, pursuant to 40 CFR 60.724(b)(2), shall be submitted to the addresses listed in Section C - General Reporting Requirement, of this permit. The report must be postmarked within ten (10) days after the end of the 6 month period being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Comment 7: TSD, Potential to Emit The table presented on page 3 of the TSD does not correctly list the potential emissions of VOCs and HAPs for this source as is reported on Appendix A to the TSD.

Response: This correction has been noted in OAQ and OES change #4.

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Commercial Finishing Corporation
Source Location: 1125 Brookside, Suite B, Indianapolis, Indiana, 46202
County: Marion
SIC Code: 3479
Operation Permit No.: T097-7798-00178
Permit Reviewer: Amanda Hennessy

The Office of Environmental Services (OES), Air Quality Management Section has reviewed a Part 70 permit application from Commercial Finishing corporation relating to the operation of miscellaneous metal parts surface coating and plastic business machines coating.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) One (1) Binks spray paint booth, identified as PB1, vents to stack S7, installed in February, 1992, equipped with one (1) air atomization, electrostatic air spray, or airless spray gun for miscellaneous metal parts coating and plastic business machines coating, at a maximum capacity of 115 units per hour and a maximum of 0.173 gallons per unit, with dry filters for overspray control, and uses one (1) Advance natural gas-fired curing oven.
- (2) One (1) Binks spray paint booth, identified as PB2, vents to stack S8, installed in February, 1992, equipped with one (1) air atomization, electrostatic air spray, or airless spray gun for miscellaneous metal parts coating and plastic business machines coating, at a maximum capacity of 115 units per hour and a maximum of 0.173 gallons per unit, with dry filters for overspray control, and uses one (1) Advance natural gas-fired curing oven.
- (3) One (1) Binks spray paint booth, identified as PB3, vents to stack S10, installed in February, 1992, equipped with one (1) air atomization, electrostatic air spray or airless spray gun for miscellaneous metal parts coating and plastic business machines coating, at a maximum capacity of 115 units per hour and a maximum of 0.173 gallons per unit, with dry filters for overspray control, and uses one (1) Advance natural gas-fired curing oven.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

- (1) One (1) Binks spray paint booth, identified as PB4, vents to stack S9, installed in December, 1993, equipped with one (1) air atomization, electrostatic air spray, or airless spray gun electrostatic for miscellaneous metal parts coating and plastic business machines coating, at a maximum capacity of 115 units per hour and a maximum of 0.173 gallons per unit, with dry filters for overspray control, and uses one (1) Advance natural gas-fired curing oven.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Combustion source flame safety purging on startup on dry off and bake oven.
- (2) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (3) Blowdown for any of the following: sight glass; boiler; compressors/ pumps; and cooling tower.
- (4) On-site fire and emergency response training approved by the department.
- (5) Filter or coalescer media changeout of four (4) paint booths dry filter replacement.
- (6) One (1) Binks Sames 8,000 CFM soft touch powder recovery booth (fully enclosed), identified as PB11, installed in April 1998, equipped with two (2) electrostatic spraying guns for miscellaneous metal parts coating, at a maximum capacity of 3876.9 ft²/hr with collection hopper and 100% capture and control efficiency.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

CP 915037-02, issued on September 17, 1991

All conditions from this previous approval were incorporated into this Part 70 permit.

Enforcement Issue

- (a) OES is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the section entitled **Unpermitted Emission Units and Pollution Control Equipment**.
- (b) OES has reviewed the matter and Limited Liability has been granted for the Paint Booth. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 12, 1996.

The application was determined to be administratively complete on December 15, 1996.

Emission Calculations

See Appendix A of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential Emissions (tons/year)
PM	198.58
PM-10	198.58
SO ₂	0
VOC	1,169
CO	0
NO _x	0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Toluene	43.48
Xylene	86.93
Ethyl benzene	13.28
TOTAL	130.4

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2000 OES emission statement data.

Pollutant	Actual Emissions (tons/year)
PM	0.0135
PM-10	0.0135
SO ₂	0.0027
VOC	4.7
CO	0
NO _x	0
HAPs(aggregate)	1.841
Methyl ethyl ketone	1.63
Toluene	0.14
2,4-Toluene diisocyanate	0.0009
Xylene	0.07

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units. The source-wide VOC emission limits will be limited to 249.0 tons per twelve-month period, rolled on a monthly basis. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) will not apply to this source.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Paint Booths PB1, PB2, PB3, and PB4	0.03 gr/dscf ⁽¹⁾	—	—	< 250 combined < 25 each	—	—	<10 tons < 25 tons combined
Total	< 250	< 250	< 250	< 250	< 250	< 250	< 10 tons <25 tons combined

⁽¹⁾ 326 IAC 6-1

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	Unclassifiable
SO ₂	Maintenance Attainment
NO ₂	Attainment
Ozone	Maintenance Attainment
CO	Attainment
Lead	Attainment

- (g) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (h) Marion County has been classified as maintenance attainment, attainment or unclassifiable for PM-10, SO₂, NO₂, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (i) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

NSPS, Subpart SS (Standards of Performance for Industrial Surface Coating: Large Appliances)

This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.450 Subpart SS-Standards of Performance for Industrial Surface Coating: Large Appliances), since the surface coating of ultraviolet cure ovens are not covered in the description of large appliance product, found at 60.451, Definitions.

NSPS, Subpart TTT (Standards of Performance for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines)

This source is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.720, Subpart TTT Standards of Performance for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines). Subpart TTT applies to this facility since plastic computer housings may be coated and the facility was built after January 8, 1986. The provisions of this subpart apply to each spray booth in which plastic parts for use in the manufacture of business machines receive prime coats, color coats, texture coats, or touch up coats.

- (1) The owner or operator shall comply with the emissions limitations including, but not limited to (a) through (d) below, on and after the date on which the initial performance test, required by Sections 60.8 and 60.723, is completed, but no later than 60 days after achieving the maximum production rate at which the affected facility will be operated, or 180 days after the initial startup, whichever date comes first. The owner or operator shall furnish IDEM, OAQ and OES, at the addresses listed in Section C - General Reporting Requirements of this Permit, a written report of the results of such performance tests. No affected facility shall cause the discharge into the atmosphere in excess of:
 - (a) 1.5 kilograms of VOC's per liter of coating solids applied from prime coating of plastic parts for business machines.
 - (b) 1.5 kilograms of VOC's per liter of coating solids applied from color coating of plastic parts for business machines.
 - (c) 2.3 kilograms of VOC's per liter of coating solids applied from texture coating of plastic parts for business machines.
 - (d) 2.3 kilograms of VOC's per liter of coating solids applied from touch-up coating of plastic parts for business machines.

All VOC emissions that are caused by coatings applied in each affected facility, regardless of the actual point of discharge of emissions, shall be included in determining compliance with these emission limits.

- (2) Conduct a performance test each nominal one (1)-month period for each affected facility according to the following procedures.

- (a) Determine the composition of coatings by analysis of each coating, as received, using:
 - (1) Reference Method 24,
 - (2) From data that have been determined by the coating manufacturer using Reference Method 24, or
 - (3) By other methods approved by the U.S. EPA.
- (b) Determine the volume of coating and the mass of VOC used for dilution of coatings from company records during each nominal one (1)-month period. Should the owner or operator use a common coating distribution system which serves affected and nonaffected spray booths, the owner or operator shall estimate the volume of coatings used at each facility by using procedures approved by IDEM, OAQ and OES. Nominal one (1)-month period means either:
 - (1) Calendar month,
 - (2) A 30-day month,
 - (3) An accounting month, or
 - (4) Similar monthly time period that is established in a statement submitted to OES and IDEM, OAQ within 60 days of the receipt of this permit.
- (3) Following the initial report, the Permittee shall:
 - (a) Report the volume-weighted average mass of VOC's per unit volume of coating solids applied for each coating operation for each affected facility during each nominal 1-month period in which the facility is not in compliance with the applicable emission limits specified in 40 CFR 60.722. These reports shall be submitted on a quarterly basis and shall be postmarked not later than 10 days after the end of each reporting quarter.
 - (b) Submit statements that each affected facility has been in compliance with the applicable emission limits specified in 40 CFR 60.722 during each nominal 1-month period. Statements of compliance shall be submitted on a semi-annual basis and shall be postmarked not later than 10 days after the end of the semi-annual period.
- (4) The Permittee shall maintain at the source, for a period of at least 2 years, records of all data and calculations used to determine monthly VOC emissions from each coating operation for each affected facility.

NESHAP, Subpart PPPP Plastic Parts and Products

The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source for the Plastic Parts and Products MACT because the source has accepted a limit of less than 10 tons of any single HAP and less than 25 tons of a combination of HAPs and the source does not use more than 100 gallons per year to coat plastic products.

NESHAP, Subpart MMMM Miscellaneous Metal Parts and Products

The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because the source has accepted a limit on HAPs. The source shall emit less than 10 tons of any single HAP and less than 25 tons of a combination of HAPs each 12 month period with compliance determined at the end of each month.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The source was constructed in 1992 and is not one of the 28 listed source categories. The total VOC emissions will be limited to less than 250 tons per twelve-month period, rolled on a monthly basis. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.

326 IAC 2-3 (Emission Offset)

Marion County is in attainment for VOC and PM10 and, therefore, the requirements of 326 IAC 2-3 (Emission Offset) do not apply.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)

The source is not subject to 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants), because it was constructed prior to July 27, 1997.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it emits more than ten (10) tons per year of VOCs. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-1

This source is located in Marion County and has a potential to emit PM greater than 100 tons per year, therefore 326 IAC 6-1 applies.

Pursuant to 326 IAC 6-1-2(a), PB1, PB2, PB3, and PB4 shall not discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf)).

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

Pursuant to CP 915037-02, issued September 17, 1991, each booth, PB1, PB2, PB3 and PB4, is limited to less than 25 tons of VOC per twelve (12) consecutive month period when not coating pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating). These limits make 326 IAC 8-1-6 not applicable to these facilities.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

When coating pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied in four (4) paint booths, PB1, PB2, PB3, and PB4, shall be limited to a daily weighted volume average of 3.5 pounds of VOCs per gallon of coating excluding water delivered to a coating applicator in the coating application systems that are air dried or forced warm air dried at temperatures up to one hundred ninety-four degrees Fahrenheit (194°F). The source has the ability to operate dryers at temperature below and above 194°F, therefore, the volatile organic compound (VOC) content of coating applied in four (4) paint booths shall be limited to a daily weighted volume average of 3.0 pounds of VOCs per gallon of coating excluding water delivered to a coating applicator for coating application systems that is air dried or forced warm air dried at temperatures above one hundred ninety-four degrees Fahrenheit (194°F). The facility shall record daily volume weighted average of lbs VOC content of coating.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

326 IAC 8-2-11 (Fabric and Vinyl Coating)

This source is not subject to the requirements of 326 IAC 8-2-11 (Fabric and Vinyl Coating) since no vinyl materials are coated at this facility.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The Paint Booths, PB1, PB2, PB3, and PB4, have applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

This monitoring condition is necessary because the media filters for the paint booths must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of the miscellaneous metal parts and plastic parts surface coating operations shall be subject to the conditions of the attached proposed Part 70 Permit No. T097-7798-00178.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Commercial Finishing
Address City IN Zip: 1125 Brookside Avenue, Suite B, Indianapolis, Indiana 46202
Permit No.: T097-7798-00178
Vent ID: Total for Paint Booths, PB1, PB2, PB3, and PB4
Reviewer: A. Hennessy
Date: July 2002

SIC: 3479

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
F63 WC82	12.47	26.9%	0.0%	26.9%	0.0%	53.3%	0.1730	115.00	3.35	3.35	66.74	1601.67	292.31	198.58	6.29	75%
F63 B70	11.45	30.5%	0.0%	30.5%	0.0%	51.1%	0.0075	500.00	3.49	3.49	13.10	314.30	57.36	32.68	6.83	75%
F63 EXL1163	11.63	29.6%	0.0%	29.6%	0.0%	51.5%	0.0270	68.00	3.44	3.44	6.32	151.69	27.68	16.46	6.68	75%
F63 LC35	12.25	26.0%	0.0%	26.0%	0.0%	55.5%	0.0050	1000.00	3.19	3.19	15.93	382.20	69.75	49.63	5.74	75%
LS-12005	10.84	25.2%	0.0%	25.2%	0.0%	62.6%	0.2500	20.00	2.73	2.73	13.66	327.80	59.82	44.39	4.36	75%
LS-22012	10.41	26.1%	0.0%	26.1%	0.0%	62.1%	0.2500	20.00	2.72	2.72	13.59	326.04	59.50	42.12	4.38	75%
LS-22015	10.97	25.8%	0.0%	25.8%	0.0%	62.4%	0.2500	20.00	2.83	2.83	14.15	339.63	61.98	44.57	4.54	75%

Potential Emissions based upon worst case coating, maximum units per hour and 8,760 hours/yr.

66.74 1601.67 292.31 198.58

(1) Data from Mfr's sheet

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * (Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Transfer efficiency was estimated at 75% for flat surface work and electrostatic air atomized, per "Air Pollution Engineering Manual" (AP-40), Table 2, page 362, 1992 edition.

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Appendix A: Emissions Calculations

HAP Emission Calculations

From Surface Coating Operations

Company Name: Commercial Finishing
Address City IN Zip: 1125 Brookside Avenue, Suite B, Indianapolis, Indiana 46202
Permit No.: T097-7798-00178
Vent ID: Total for Paint Booths, PB1, PB2, PB3, and PB4
Reviewer: A. Hennessy
Date: July 2002

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % 2-Butoxyethanol (glycol ether)	Weight % Methyl Ethyl Ketone	Weight % Glycol Ethers	Weight % Toluene	Weight % Xylene	Weight % Methyl Isobutyl Ketone	Weight % Benzene	Weight % Ethylbenzene	2-Butoxyeth- onal (ton/yr) (glycol ether)	Methyl Ethyl Ketone (ton/yr)	Glycol Ethers (ton/yr)	Toluene (ton/yr)	Xylene (ton/yr)	Methyl Isobutyl Ketone (ton/yr)	Benzene (ton/yr)	Ethylbenzene (ton/yr)	Total Potential per coating (tons/yr)
F63 WC82	12.47	0.1730	115.00	0.0%	0.0%	0.0%	1.0%	2.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	10.87	21.73	0.00	0.00	0.00	32.60
F63 B70	11.45	0.0075	500.00	0.0%	0.0%	0.0%	2.0%	2.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	3.76	3.76	0.00	0.00	0.00	7.52
F63 EXL1163	11.63	0.0270	68.00	0.0%	0.0%	0.0%	2.0%	1.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	1.87	0.94	0.00	0.00	0.00	2.81
F63 LC35	12.25	0.0050	1000.00	0.0%	0.0%	0.0%	2.0%	1.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	5.37	2.68	0.00	0.00	0.00	8.05
LS-12005	10.84	0.2500	20.00	0.0%	0.0%	0.0%	0.0%	5.6%	0.0%	0.0%	1.4%	0.00	0.00	0.00	0.00	13.29	0.00	0.00	3.32	16.62
LS-22012	10.41	0.2500	20.00	0.0%	0.0%	0.0%	0.0%	5.6%	0.0%	0.0%	1.4%	0.00	0.00	0.00	0.00	12.77	0.00	0.00	3.19	15.96
LS-22015	10.97	0.2500	20.00	0.0%	0.0%	0.0%	0.0%	5.6%	0.0%	0.0%	1.4%	0.00	0.00	0.00	0.00	13.45	0.00	0.00	3.36	16.82

Worst Case Coating: 0.00 0.00 0.00 10.87 21.73 0.00 0.00 3.36 32.60
27.77*

* Determine Potential HAPs at Limited PTE: 249 tons VOC/yr x yr/292.31 tons VOC x 21.73 ton Xylene = 18.51 tons Xylene

State Potential Emissions based upon worst case HAP loading and 8,760 hr/yr.

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs